

MORGAN & MORGAN

September 22, 2021

Via ECF Only

Hon. Sanket J. Bulsara, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Chambers 304N, Courtroom 324N
Brooklyn, New York 11201

Re: *Kathleen Calliste v. Allstate Insurance Company*
Civil Action No. 1:21-cv-02483 (DG) SJB)

Dear Magistrate Judge Bulsara:

This firm represents Plaintiff, Kathleen Calliste (“Plaintiff”) in the above-referenced action.

We write to request an adjournment of the Initial Conference scheduled for September 24, 2021 at 10:30 a.m. and a 60-day extension to the Scheduling Order filed on May 11, 2021. *See* Dkt No. 12.

The purpose of this request for an adjournment and extension of deadlines is that I have just entered my appearance in this matter to replace former Plaintiff’s counsel, Ms. Amanda Peterson, Esq., and would like additional time to make myself familiar with the file in order to competently represent Plaintiff for the remainder of this action. I have conferred with counsel for Defendant regarding this request and she has given her consent to a 60-day extension. There has been one prior request for adjournment made by Ms. Peterson on September 7, 2021. This request was denied until new Plaintiff’s counsel was identified. Ms. Peterson’s motion to withdraw as counsel will be forthcoming.

Should you have any further questions, please do not hesitate to contact me at (857) 383-4915 or rlang@forthepeople.com.

Respectfully,

MORGAN & MORGAN, P.A.

By: /s/Ryan Lang
Ryan Lang, Esq.

cc: **Via ECF Only**
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